January 17, 2012

Federal Communications Commission
OET 12-338
Amendment of Parts 1, 2, 15, 74, 78, 87, 90 and 97 of the Rules

To the Commission,

As a licensee in the Amateur Radio Service, I am writing in support of the Commission's proposal to amend its rules to reallocate the segment of 1900 to 2000 kHz to the Amateur Radio Service on a primary basis as detailed in paragraphs 20-24.

With solar flux values predicted to decline a few years from now as Cycle 24 transitions into Cycle 25, the 160 meter band will likely provide much of the local (within 300 to 500 miles) communications for radio amateurs particularly during the winter night time hours. With a very low solar flux as that experienced from 2007 through 2009 and into 2010, the 80 meter allocation often was unable to support local communications using Near Incident Vertical Skywave (NVIS) techniques after sundown until just before sunrise during the winter months. When the F2 Critical Frequency drops below 4 MHz the 160 meter band can be used for NVIS techniques. Promoting the Amateur Radio Service to primary status in the 1900 to 2000 kHz band as proposed will assist local emergency groups in planning to use 160 meters for local emergency communications support. As it is expected that radiolocation use of this band will continue to decline, action on this proposal now will give radio amateurs time to incorporate 160 meters in their communications plans.

Amateur radio use of 160 meters continues to increase in my experience. Experimentation with compromise antennas (low height above ground and/or limited space as well as mobile) is of high interest among operators using 160 meters. Radio amateurs have devised a variety of antennas to meet these challenges as well as enhance local or long distance communications. The reallocation of 1900 to 2000 kHz to the Amateur Radio service on a primary basis will encourage more operators to try the 160 meter band as modern transceivers include the band.

Respectfully submitted,

Nathan Bargmann, N0NB